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January 3, 2025

VIA ECF

Honorable Miroslav Lovric
United States District Court
Northern District of New York
15 Henry Street
Binghamton, NY 13901

Re: *Shara v. Binghamton Precast & Supply Corp. et al.*
Civil Action No. 3:23-cv-135

Your Honor:

We represent the plaintiff, Holly Shara, in the above-captioned matter, and submit this letter jointly with counsel for Defendants to provide the Court with a status update in accordance with the Court's Order dated December 6, 2024 (Dkt. No. 45).

On December 17, 2024, Defendants served their third supplemental responses to Plaintiff's document requests, which also included a proposed protective order. Plaintiff's counsel reviewed the proposed protective order and provided comments to Defendants' counsel, and counsel are working to finalize the terms of the proposed order before submitting the proposed order to the Court.

Plaintiff has also reviewed the documents in the three (3) job folders that Defendants produced on November 25, 2024 and found that the selected job folders did not contain the documents that Plaintiff was seeking. Plaintiff was traveling over the holidays but is in the process of identifying additional job folders that she believes will contain more relevant documents, which Plaintiff expects to share with Defendants in the coming days.

Defendants also performed a search for relevant emails from Plaintiff's coworkers and received a hit list that reflected a very large number of emails. Counsel for the parties are working to narrow the search terms and parameters to reduce the number of search hits to a more reasonable figure.

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Given the status of discovery and the current discovery deadline of February 3, 2025, the parties anticipate that additional time will be needed to complete fact discovery and propose making said request on or before January 17, 2025, at which point counsel hope to have more clarity on the status of the job folders and email search.

We thank the Court for its continued attention to this matter.

Respectfully submitted,

/s/ Adam Sackowitz
Adam Sackowitz

Cc: All counsel of record (via ECF)